

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

On April 4, 2023, the above-captioned debtor (the “Debtor”) filed a petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtor requests that the following relief be provided on a first day basis (check those that apply):

1. ☐ Motion Seeking the Joint Administration of Multiple Debtor Bankruptcy Cases.
2. ☒ Motion for an Order Authorizing the Debtor an Extension of Time Within Which to File Statements And Schedules.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

3. ☐ Motion for an Order Authorizing the Emergency or Interim Use of Cash Collateral or Debtor-In-Possession Financing Pending the Noticing and Scheduling of an Interim or Final Hearing For Financing Pursuant to Bankruptcy Code §§ 363 and 364 and Fed. R. Bankr. P. 4001.
4. ☒ Motion for an Order Authorizing the Debtor to Maintain Existing Bank Accounts and Business Forms and Cash Management Procedures Providing the United States Trustee's Office with a 60 Day Period to Object to Said Order Before it Becomes a Final Order.
5. ☐ Motion for an Order Authorizing a Debtor to Modify the Investment Guidelines Set Forth in Bankruptcy Code § 345 on an Interim Basis, Providing the United States Trustee's Office and Any Other Parties-In-Interest a 60-Day Period to Object to Said Order Before it Become A Final Order.
6. ☐ Motion for an Order Authorizing the Debtor to Pay Prepetition Wages, Salaries, Compensation, Employee Benefits and Reimbursable Business Expenses Up To the Limits Set Forth in Bankruptcy Code § 507(A).
7. ☐ Motion for an Order Authorizing the Debtor to Pay Prepetition Sales, Use, Payroll And Other Taxes That Are Otherwise Priority Claims Under Bankruptcy Code § 507.
8. ☐ Motion for an Order Authorizing the Debtor to Continue Credit Card Facilities.
9. ☐ Motion for an Order Authorizing the Debtor to Honor Certain Pre-Petition Customer Obligations, Deposits, Rebates, Etc.
10. ☐ Motion for an Order Authorizing the Debtor to Continue With and Pay Pre-Petition Outstanding Amounts Due on Various Insurance Policies.
11. ☐ Motion for an Order Authorizing Payment of Outstanding and Unpaid Pre-Petition Debt to Certain Vendors Who Provide Critical and Necessary Services and/or Products to the Debtor.

- 12. ☐ Motion for an Order Pursuant to Bankruptcy Code § 366 Regarding Adequate Assurance for the Future Performance for Utilities and Establishing Procedures for Determining Requests for Additional Adequate Assurance.
- 13. ☒ Motion for an Order Authorizing the Debtor to Retain a Claims and Noticing Agent.
- 14. ☐ Motion for an Order Establishing Noticing Procedures.
- 15. ☒ Others

Application for Designation as Complex Chapter 11 Case

Debtor's Motion for an Order Suspending Entry and Service of Standard Notice of Commencement.

Debtor's Motion For an Order: (I) Authorizing It to File a List of the Top Law Firms With Talc Claims Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of This Case.

Debtor's Motion Pursuant to 11 U.S.C. § 1505 for an Order Authorizing It to Act as Foreign Representative on Behalf of the Debtor's Estate.

Dated: April 4, 2023

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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